HHD-CV22-5071036-S

:

KEREN PRESCOTT : JD OF HARTFORD

:

V : At Hartford

.

YULIYA GILSHTEYN : March 24, 2023

MOTION TO STAY ORDER GRANTING PREJUDGMENT REMEDY PENDING APPEAL

Pursuant to Connecticut General Statutes §52-278l, the Defendant, Yulia Gilshteyn, hereby moves to stay this Court's order granting the Plaintiff's Prejudgment Remedy on the following grounds:

- 1. The Court issued its decision granting the Plaintiff's Application for Prejudgment Remedy on 3/15/23.
- 2. The Defendant filed her Appeal of that judgment on 3/22/23.
- 3. Pursuant to CGS §52-278l, this Court can stay that order following its determination of a bond with surety in a sum sufficient to indemnify the Plaintiff for any damages which may accrue as the result of such a stay.
- 4. In the present case, there are no discernable damages which may accrue as the result of such a stay.

THEREFORE, the Defendant asks this Court to issue a stay pending the appeal of the judgment without a bond, or to determine a sum sufficient and issue a stay and allow the Defendant to post such bond with surety. Respectfully Submitted,

Yuliya Gilshteyn, The Defendant

BY: /s/ Kevin M. Smith /s/ KEVIN M. SMITH, ESQ. Pattis & Smith, LLC 383 Orange Street, 1st Floor New Haven, CT 06511 203-393-3017 203-393-9745 (fax) ksmith@pattisandsmith.com

CERTIFICATION

This is to certify that a copy of the foregoing has been emailed and/or mailed, this day, postage prepaid, to all counsel and pro se appearances as follows:

BBB Attorneys, LLC 3651 Main Street, Suite 200 Stratford, CT 06614

direct: (475) 284-2138 office: (203) 562-0900 fax: (203) 562-0902

kkrayeske@bbbattorneys.com